

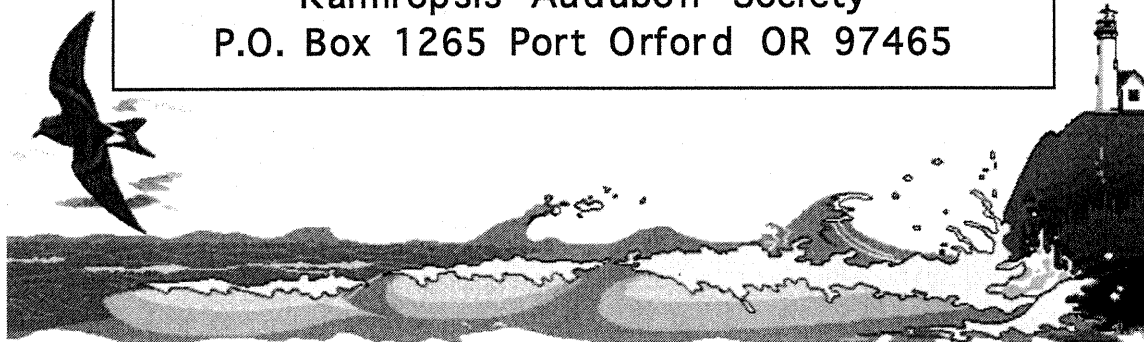
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OCT 10 2007

Kalmiopsis Audubon Society
P.O. Box 1265 Port Orford OR 97465



Oct. 2, 2007

Bureau of Land Management,
Western Oregon Plan Revisions Office
333 SW 1st. Avenue,
Portland, OR 97208

Re: BLM Western Oregon Plan Revisions

Greetings:

I am writing on behalf of the Kalmiopsis Audubon Society, based out of Curry County, Oregon. Our group has 175 members who are concerned about habitat for birds, fish, and wildlife, and so I have comments to make about the alternatives presented in your proposed Western Oregon Plan Revisions.

First, we are grateful that you have recognized that designated Areas of Environmental Concern in Curry County (in the Coos Bay District) should not be opened to further logging.

However, we are very concerned about your proposal to reduce the area of riparian reserves—basically shrinking the buffer zone along our rivers from 100 feet to 25 feet. This is well below scientifically recognized stream-buffer widths for minimizing impacts and problems with landslides and floods. Our area, sometimes called the Wild Rivers Coast, is known for its relatively healthy fish runs, and local watershed councils have--over the years--put lots of effort (and state and federal monies) into restoration of our rivers. Although BLM lands are a small part of any river's watershed in our area (except for the North Fork Chetco's, which has a fair amount of BLM land), even small areas where there is erosion can lead to serious water quality problems downstream. To us, it seems that the major shift in forest management called for by the WOPR is inconsistent with the values of our local communities that depend on fisheries and fisheries based tourism.

We are also concerned with your plans to open up old-growth forests to clearcut logging beyond our local area. Over the next decade, preferred alternative 2 calls for building 1,000 miles of new logging roads, and for cutting 34,800 acres of trees that are over 200 years old and 109,600 acres of mature forest over 100 years old. The preferred alternative reduces Late-successional reserves established under the NWFP by 47% and Riparian Reserves by 57%.

Old-growth forests are crucial habitat for Northern Spotted Owls and marbled murrelets and to a host of other creatures. With only 5 percent of old-growth remaining in western Oregon, these forests are crucial for conserving endangered species, water quality, and a broad range of ecosystem services and biodiversity. The preferred alternative would turn these complex ecosystems into tree plantations susceptible to severe wildfire. Although the BLM officially states that this plan is consistent with the Endangered Species Act, a key underpinning of this WOPR, the new Spotted Owl Recovery plan, has been heavily politicized and deemed scientifically indefensible. It doesn't take a PhD to recognize that eliminating so much old-growth habitat in such a short time will further imperil spotted owls.

Reducing the width of riparian buffer zones, logging old growth trees, and building so many new roads are all inconsistent with contemporary approaches to ecosystem management and with modern day watershed restoration efforts. Moreover, the WOPR does not acknowledge global warming and the crucial importance of large trees in sequestering carbon.

In a broader sense, the proposed WOPR will unravel the protections of Northwest Forest Plan, leading to degradation of rivers and forest habitat, and to greatly increased conflict and controversy, in all western Oregon.

For these reasons, we feel the direction of the WOPR-- to abandon the Northwest Forest Plan-- is unfortunate. Over the past decade, the conservation community and timber industry have been coming together around plans to do extensive thinning in our Northwest forests, especially in areas managed as tree plantations. This is the kind of forest management that is needed and where consensus and compromise are being hammered out. The great example here is the Siuslaw National Forest, which has increased its timber harvest and added forest jobs through thinning but without cutting old growth trees. In our own area, the Siskiyou National Forest has been preparing to implement a similar plan, which will also safeguard communities from wildfire. This is the direction where the future lies, NOT in logging Oregon's last great trees, which --of course--are some of America's last great trees.

At a time when public consensus for protecting old-growth forests and for thinning second-growth forests is high, it seems utterly retrograde for the BLM to propose clearcutting Oregon's rare 200-year-old forests and increased logging in riparian reserve areas.

We urge you to revise your plan to protect remaining old-growth forests, to conserve the buffer protection for streams afforded by riparian reserves, and to encourage thinning in already logged-over areas. Unless your plans are further revised, we support the No Action alternative.

Thank you for considering our comments.

Sincerely,



Ann Vileisis
President